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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
_____ DIVISION

Plaintiff(s),

Catherine Ann Kramer

v.

Henry Industries, Inc.

Defendant(s). (Enter above the full name(s)
of all defendants in this lawsuit. Please
attach additional sheets if necessary.)

Case No. _____

(to be assigned by Clerk of District Court)

JURY TRIAL DEMANDED

YES ☐ NO ☒

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment discrimination lawsuit is based on (check only those that apply):

____ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.

NOTE: *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

____ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).

NOTE: *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*



____ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

NOTE: *In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

____ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

____ Other (Describe)

PARTIES

2. Plaintiff's name: Catherine Ann Kramer

Plaintiff's address: 740 Central Parkway

Street address or P.O. Box

Florissant, Mo. 63031

City/County/State/Zip Code

314.262.1814

Area code and telephone number

3. Defendant's name: Henry Industries, Inc.

Defendant's address: 1602 Jasper Street

Street address or P.O. Box

Kansas City, Mo. 64116

City/County/State/Zip Code

816.221.9611

Area code and telephone number

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

345 Dunn Rd. Florissant Mo. 63031
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

initially 4 May 2018 filed Complaint immediately with the State

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri

Commission on Human Rights?

☒ Yes

Date filed:

5/28/19

☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal

Employment Opportunity Commission or other federal agency?

☒ Yes

Date filed:

12/9/19

☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes

☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☒

60 days or more have passed since I filed my charge of age discrimination with the

Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the

Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☒ termination of my employment

☒ failure to promote me

☐ failure to accommodate my disability

☐ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☐ other conduct (specify):

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

- ☒ race
☐ religion
☐ national origin
☒ color
☒ gender
☒ disability
☐ age (birth year is: _____)
☐ other:

Did you state the same reason(s) in your charge of discrimination?

- ☒ Yes ☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

Asking questions inappropriately regarding the way I walk. Having others employed and contracted by Henry constantly asking me questions about my disabilities and why I would want to be disabled or how am I disabled. forcing anxiety leading me to have an ambulance pick me up and

(Continue to page 6, if additional space is needed.)

then make up stories that I just wanted off work. I had to enroll into Health Insurance \$180 I Couldn't even Afford to have a doctor help me with some of my issues. I even asked if I could just have a particular parking spot next to the door and one minute it's okay the next I have to wait in my car to park. I was forced to come in on my days off work for one hour mandatory meetings that most of the other employees did not attend. I was asked to work only 4 days a week so this other person could also have 32 hours and full time employment. I have everything in emails and I requested audio & video although Henry & Cvs refused to allow me to have access for proof. I have been wrongfully terminated due to the last girl they hired to force me to quit and I refused to because I need funds to survive.

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

- ☒ are still being committed by the defendant.
- ☐ are no longer being committed by the defendant.
- ☐ may still be being committed by the defendant.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes.

I want to have this on their permanent record and they should hopefully learn from their mistakes. Complaints that are legit and valid should be taken seriously and with care and support and offer to assist the helpless people.

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12 day of November, 2020.

Signature of Plaintiff Catherine Ann Kramer